P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

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(916) 322-5662

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June 5, 1984

Carolyn J. Fahnestock Executive Administrator Pacific Water Quality Association 2134 Main Street Huntington Beach CA 92648

Re: Our File No. A-84-134

Dear Carolyn:

This is in response to your letter of May 16, 1984, regarding whether the Pacific Water Quality Association has incurred any reporting obligation by virtue of having paid an honorarium to a State Senator who participated in your annual convention.

As I indicated during our telephone conversation, because the Association made the payment out of general funds and not the funds of its PAC, and because the Association is not an employer of a lobbyist, no reporting by the Association is required with respect to the honorarium.

Sincerely,

Carla J. Wardlow

Political Reform Consultant



Pacific Water Quality Association

2134 MAIN STREET HU (714) 960-2424 AY 21 | 59 PH 194

HUNTINGTON BEACH, CALIFORNIA 92648

CAROLYN J. FAHNESTOCK Executive Administrator

May 16, 1984

Carla Wardlow Fair Political Practices Commission 1100 K Street Sacramento, CA 95814

Dear Carla:

We recently had a California State Senator speak at our annual convention. We will be sending him an honorarium from our general funds rather than from our PAC funds. I would appreciate having written confirmation that this does not have to be reported as a contribution or other PAC expenditure. Our PAC is a Recipient Committee - not a Lobbyist Employer Committee.

Thank you for your assistance.

Sincerely yours,

PACIFIC WATER QUALITY ASSOCIATION

(Mrs.) Carolyn J. Fahnestock

Executive Administrator

CJF/s